

## **REMARK**

Applicants respectfully request reconsideration of this application as amended. Claims 80, 81, 84, 85, and 94 have been amended; claims 86-93, and 95-116 have been cancelled; and claims 117-131 have been added. Therefore, claims 80-85, 94, and 117-131 are now presented for examination.

### **U.S.C. §112 Rejection**

#### **Paragraph 1**

Claims 86, 93, 102, and 114 have been rejected under 35 U.S.C. §112, first paragraph, as containing subject matter which was not described in the specification in such a way as to reasonably convey to one skilled in the relevant art that the inventors, at the time the application was filed, had possession of the claimed invention.

Since claims 86, 93, 102, and 114 have been cancelled, the Applicants respectfully request that the Examiner withdraw his rejection to these claims and allow them.

### **U.S.C. §103(a) Rejections**

#### **Aldous in view of Hardesty, Clarke, and Research Disclosure**

In a previous Office Action, claims 80-116 (some of which have been cancelled by this amendment) were rejected under 35 U.S.C. §103(a) as being unpatentable over Aldous et al. (U.S. Patent No. 5,183,404, hereinafter “Aldous”) in view of Hardesty (U.S. Patent No. 4,241,974, hereinafter “Hardesty”), Clarke

(U.S. Patent No., 4,611,875, hereinafter "Clarke"), and Research Disclosure entitled "Integrated Services Digital Network (ISDN) Cable Terminator/Filter Device," published by Kenneth Mason Publications Ltd., England in September 1990 (RD).

**Aldous** discloses a communications card for receiving a media connector that is capable of being mounted in a computer. The communications card is divided into a retractable access portion of the communications card. The retractable portion can be accessed by manipulating an actuating mechanism to release the retractable portion. The retractable portion may be reinserted back into the card.

**Hardesty** discloses an adaptor for connecting two telephone cords to a wall terminal.

**Clarke** discloses a power adaptor used to connect electrical power to a telephone station via a cross-connect jack.

**Research Disclosure** discloses an ISDN cable terminator/filter device that is used to provide ISDN services.

For the reasons set forth below, the Applicants respectfully disagree with the Examiner that the remaining claims of claims 80-116 are unpatentable as being obvious over Aldous in view of Hardesty, Clarke, and RD.

First, Aldous, Hardesty, Clarke, and RD do not, in combination, disclose the Applicants' invention as recited by claims 80-116. Applicants maintain that none of Aldous, Hardesty, Clarke, and RD teaches or suggests modification of

their respective adaptors to form the adaptor of Applicants' invention as recited by the claims.

Aldous addresses a need for a connector interface for use with a 5 mm PCMCIA communications card for use with a laptop. The Applicants' invention as recited by the claims addresses a further need. The Applicants' invention as recited by the claims addresses a need for a connector device that can be replaced without having to replace the communications card to which it is attached (see Application, page 4, lines 13-15).

Hardesty addresses a need for an adaptor capable of interconnecting multiple plugs to a wall terminal. Applicants submit that neither Hardesty nor Aldous teaches or suggests modifying Aldous using Hardesty. Furthermore, the combination of Aldous and Hardesty would not produce the Applicants' invention as recited in the claims. As stated previously, the only way to use the Hardesty adaptor with an Aldous connector device would be to connect a telephone line between them, which would not result in a connector card and receptacle module being removably attached to each other.

Clarke addresses a need for providing power to telephone stations via a cross-connect field power adaptor plug/jack. Again, neither Aldous nor Clarke teaches or suggests modifying Aldous using the teachings of Clarke. Furthermore, the combination of Aldous and Clarke would not produce the Applicants' invention as recited by the claims.

RD addresses a need for providing ISDN service and filtering for ISDN telephones. There is no teaching or suggestion in Aldous or RD to modify

Aldous using the teachings of RD. Furthermore, combining Aldous and RD would not produce the Applicants' invention as recited by the claims.

Secondly, Aldous does not disclose a receptacle module and card body in which the receptacle module may be inserted into and removed from (i.e., "removably inserted") the card body, as required by the Applicants' invention as recited in claims 80-85 and 94. In Aldous, the communications card 70 comprises a retractable portion 72 to which a media connector may be attached. The retractable portion is retracted using a spring. However, Aldous does not teach or suggest that the retractable portion has a portion that can be inserted into a card body to make it removable as required by the Applicants' invention as recited by the claims.

The Examiner refers to FIGS. 7 and 8 of Aldous for rejecting the claims. However, it is still respectfully submitted that neither one of these figures illustrates the claim language of the Applicants' invention. Specifically, the receptacle module of Aldous is not capable of being inserted into a card body because in Aldous, the communications card is a single module. Furthermore, the receptacle module of Aldous is not capable of being removed from the card body, since the communications card of Aldous is a single module.

Furthermore, none of Hardesty, Clarke, and RD teaches an adaptor having a receptacle module that may be removed from a card body. Importantly, Hardesty, Clarke, and RD do not even teach a communications card that is made up of a receptacle module and a card body such that a portion of the receptacle

module is removably inserted into the card body, as required by the Applicants' invention as recited by the claims.

Since none of Aldous, Hardesty, Clarke, and RD teach or suggest, at the least, an adaptor having a receptacle module that is removably inserted into a card body, they do not singly, or in combination, disclose the Applicants' invention as recited by the claims.

As such, the Applicants respectfully request that the Examiner's rejection of the remaining claims of claims 80-116 be withdrawn, and that the claims as amended, be allowed.

### **New Claims 117-131**

Each of claims 117-131 is supported by the original specification, and do not add any new subject matter. Furthermore, none of these claims is taught or disclosed by the references discussed herein. For example, none of these references (Aldous, Hardesty, Clarke, and RD) teaches or discloses a communications device having receptacles that are positioned in sliding drawers, as required by claims 124-128. Additionally, none of these references teaches or discloses a communications device having recesses that are formed by jaws, as required by claims 129-131.

Furthermore, dependent claims 117-123 all inherit the limitations of their respective independent claims, and since it is believed that those independent claims are distinguishable over the known prior art (see discussion above), and therefore allowable, it is also believed that those dependent claims are allowable.

### **Conclusion**

Applicants respectfully submit that the claim amendments, and the new claims do not add any new subject matter, and are all supported by the original specification. Furthermore, the Applicants submit that any previous rejections have been overcome by the amendment and remark, and that the claims are now in condition for allowance if no further art is found. Accordingly, Applicants respectfully request that the presented claims be allowed.

### **Invitation for a Telephone Interview**

The Examiner is requested to call the undersigned at (303) 740-1980 if there remains any issue with allowance of the case.

**R qu st for an Extension of Time**

The Applicants respectfully petition for an extension of time to respond to the outstanding Office Action pursuant to 37 C.F.R. § 1.136(a) should one be necessary. Please charge our Deposit Account No. 02-2666 to cover the necessary fee under 37 C.F.R. § 1.17(a) for such an extension.

**Charge our Deposit Account**

Please charge any shortage to our Deposit Account No. 02-2666.

Respectfully submitted,

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## Version With Markings Showing Changes Made

### In th Claims:

Presented below are the amended claims in a marked-up version showing additions in underlined text, and deletions in brackets.

- 1 80. (Twice Amended) A [compliant] communications device, comprising:
  - 2 [a receptacle module configured for interfacing with a communications
  - 3 line; and]
  - 4 a card body [configured] for making operative and removable connection
  - 5 with a signal utilizing device[, wherein the receptacle module and
  - 6 card body are further configured to be removably attached to each
  - 7 other as a unitary module.]; and
  - 1 a receptacle module for interfacing with a communications line, the
  - 2 receptacle module having a portion for removable insertion into the
  - 3 card body.

- 1 81. (Once Amended) The communications device of claim 80, wherein the
- 2 receptacle module comprises a recess configured for closely receiving a
- 3 plug of the communications line.

- 1 84. (Once Amended) The communications device of claim 81, wherein the
- 2 receptacle module further comprises first and second electrical conductors
- 3 provided in each of the [recess] recesses, the first and second electrical

4 conductor being positioned such that they make electrical continuity with  
5 first and second electrical contacts in the plug when the plug is received  
6 by the recess.

1 85. (Once Amended) The communications device of claim 80, wherein the  
2 receptacle module comprises two recesses configured for closely  
3 receiving two [plug] plugs, respectively.

1 86. - 93. (Cancel)

1 94. (Once Amended) The communications device of claim [87] 117, wherein  
2 the card body is a Type III PCMCIA compliant card body.

1 95. - 116. (Cancel)

1 117. - 131. (New)